

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

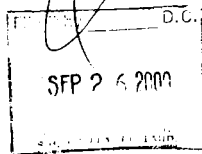
CASE NO.

00-6281

18 U.S.C. 1546
18 U.S.C. 1543
18 U.S.C. 371
18 U.S.C. 2

CR-RYSKAMP.

**MAGISTRATE JUDGE
JOHNSON**



UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
VLADIMIR LVOVICH YAROSH,)
)
Defendant.)
_____)

INDICTMENT

The Grand Jury charges that:

COUNT 1

1. From on or about November 16, 1996, to on or about July 8, 1998, in the Southern District of Florida, Broward County, and elsewhere, the defendant,

VLADIMIR LVOVICH YAROSH,
did knowingly and willfully, combine, conspire, confederate and agree with persons known and unknown to the Grand Jury, to commit offenses against the United States, that is, to violate Title 18, United States Code, Sections 1543 and 1546.

THE PURPOSE AND OBJECT OF THE CONSPIRACY

2. It was the purpose and object of this conspiracy to obtain fraudulent identification documents that would be unlawfully used to legalize the immigration status of aliens seeking to obtain visitor status in the United States in exchange for substantial fees.

MANNER AND MEANS OF THE CONSPIRACY

3. It was part of the conspiracy that the defendant and the other co-conspirators would obtain photographs from aliens seeking to visit the United States for the purpose of obtaining fraudulent identification documents.

4. It was further part of the conspiracy that the defendant and the other co-conspirators would for a substantial fee forward the fraudulent identification documents to the United States on behalf of the alien seeking to visit the United States.

5. It was further part of the conspiracy that the defendant and the other co-conspirators would provide fraudulently obtained passports and visas to aliens seeking to visit the United States.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendant and the other co-conspirators committed the following overt acts, among others, in the Southern District of Florida and elsewhere:

a) On or about February 21, 1997, in the Southern District of Florida, the defendant offered to obtain a fraudulent Russian passport and a fraudulent United States tourist visa for Inge Yekabsone for a fee of \$4,000 in U.S. currency.

b) On or about February 26, 1997, in the Southern District of Florida, a co-conspirator collected \$500 in U.S. currency from Inge Yekabsone as down payment for the preparation of fraudulent documents for a passport and visa.

c) On or about May 27, 1997, in the Southern District of Florida, the defendant directed Inge Yekabsone to contact Sergey Maximov concerning a fraudulent passport and visa.

d) On or about July 17, 1997, in the Southern District of Florida, the defendant and a co-conspirator collected photographs of Inge Yekabsone and \$1,700 in U.S. currency from Inge Yekabsone as partial payment for a fraudulent visa and passport.

e) On or about July 23, 1997, in the Southern District of Florida, Sergey Maximov had a telephone conversation with Inge Yekabsone about providing a false name for a passport.

f) On or about August 15, 1997, in the Southern District of Florida, a co-conspirator collected \$3,500 in U.S. currency from Inge Yekabsone as partial payment for the preparation of fraudulent documents relating to a passport and visa.

g) On or about December 16, 1997, in the Southern District of Florida, Sergey Maximov provided Inge Yekabsone with two Russian passports obtained by fraud, one bearing the name Ilona Bernstein and the other bearing the name Ilona Berezina.

h) On or about December 18, 1997, in the Southern District of Florida, a co-conspirator collected an additional \$1,750 in U.S. currency from Inge Yekabsone for the preparation of passports that were obtained by fraud.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

On or about December 18, 1998, in the Southern District of Florida, Broward County, and elsewhere, the defendant,

VLADIMIR LVOVICH YAROSH,

did knowingly and willfully cause another to furnish to Inge Yekabsone for use a false and fraudulent passport and instrument purporting to be a passport, that is, a Russian passport, 21N01348429, in the name of Ilona Berezina for use by Inge Yekabsone, in violation of Title 18, United States Code, Sections 1543 and 2.

COUNT 3

On or about December 18, 1998, in the Southern District of Florida, Broward County, and elsewhere, the defendant,

VLADIMIR LVOVICH YAROSH,

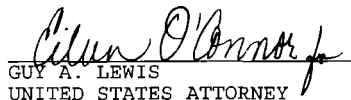
did knowingly cause an application to be made for a non-immigrant visitor visa, B-1/B-2, a document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States which application falsely identified the applicant as Ilona Berezina, which the defendant

then and there well knew was false, in that the true name of the applicant was Inge Yekabsone and not Ilona Berezina, in violation of Title 18, United States Code, Sections 1546(a) and 2.

A TRUE BILL

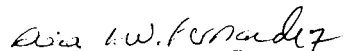


FOREPERSON



GUY A. LEWIS

UNITED STATES ATTORNEY



DIANA L.W. FERNANDEZ

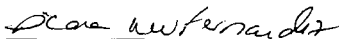
ASSISTANT UNITED STATES ATTORNEY

BOND RECOMMENDATION SHEET

VLADIMIR LVOVICH YAROSH

DEFENDANT

\$ 100,000 Personal Surety Bond and \$ 10,000 Corporate Surety
Bond are recommended as to the defendant.



DIANA L.W. FERNANDEZ
ASSISTANT UNITED STATES ATTORNEY
Court I.D. #A5500017
500 E. Broward Blvd., Suite 700
Fort Lauderdale, FL 33394

Agent:
INS, S/A Berkholcs
S/A Gershkoff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
PENALTY SHEET

Defendant's Name: **VLADIMIR LVOVICH YAROSH**

Count #: 1 18 U.S.C. 371 - Conspiracy to Commit Passport and Visa Fraud

*Max. Penalty: 5 years' imprisonment - \$250,000 fine

Count #: 2 18 U.S.C. 1543 - Passport Fraud

*Max. Penalty: 10 years' imprisonment - \$250,000 fine

Count #: 3 18 U.S.C. 1546 - Visa Fraud

*Max. Penalty: 10 years' imprisonment - \$250,000 fine

Count #:

*Max. Penalty:

Count #:

*Max. Penalty:

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES OF AMERICA

CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY*

VLADIMIR IVOVICH YAROSH

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes ☐ No ☐
 Number of New Defendants _____
 Total number of counts _____

☐ Miami ☐ Key West
☒ FTL ☐ WPB ☐ FTP

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
 List language and/or dialect _____

4. This case will take 4 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)

(Check only one)

I	0 to 5 days	<input checked="" type="checkbox"/>	Petty	<input type="checkbox"/>
II	6 to 10 days	<input type="checkbox"/>	Minor	<input type="checkbox"/>
III	11 to 20 days	<input type="checkbox"/>	Misdem.	<input type="checkbox"/>
IV	21 to 60 days	<input type="checkbox"/>	Felony	<input checked="" type="checkbox"/>
V	61 days and over	<input type="checkbox"/>		

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes:

Judge: _____ Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) No

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? x Yes ☐ No If yes, was it pending in the Central Region? x Yes ☐ No

8. Did this case originate in the Narcotics Section, Miami? ☐ Yes ☒ No

Diana L.W. Fernandez
 DIANA L.W. FERNANDEZ
 ASSISTANT UNITED STATES ATTORNEY
 Court I.D. # A5500017